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-and-

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*Attorneys for Defendants Genesis Genetics
Institute, LLC and Mark R. Hughes*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHAYA GROSSBAUM and
MENACHEM GROSSBAUM, her
spouse, individually and as *guardians
ad litem* of the infant ROSIE
GROSSBAUM,

Plaintiffs,

-VS-

GENESIS GENETICS INSTITUTE,
LLC, of the State of Michigan, MARK
R. HUGHES, NEW YORK
UNIVERSITY SCHOOL OF
MEDICINE and NEW YORK
UNIVERSITY HOSPITALS
CENTER, both corporations in the
State of New York, ABC CORPS. 1-
10, JOHN DOES 1-10,

Defendants.

CIVIL ACTION NO.
07-CV-1359 (GEB)(ES)

NOTICE OF MOTION
FOR SUMMARY JUDGMENT
ORAL ARGUMENT REQUESTED

To: Lewis Stein, Esq.
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Attorneys for Plaintiffs

PLEASE TAKE NOTICE that on March 7, 2011 or as soon thereafter as counsel may be heard, Defendants Genesis Genetics Institute, LLC and Dr. Mark R. Hughes (collectively "Genesis"), by their undersigned counsel, shall apply to the Honorable Garrett E. Brown, Jr., Chief Judge, United States District Court for the District of New Jersey, at the Clarkson S. Fisher Federal Building and U.S. Courthouse, 402 E. State Street, Room 4050, Trenton, New Jersey 08608, for an Order Granting the Motion For Summary Judgment filed by Defendants Genesis Genetics Institute, LLC and Dr. Mark R. Hughes.

PLEASE TAKE FURTHER NOTICE that in support of the within application, Defendants shall rely on their Memorandum Of Law, Statement Of Undisputed Material Facts Pursuant To Local Civil Rule 56.1 and the Declaration Of Sarah Blaine, Esq. In Support Of Genesis Genetics Institute, LLC And Mark R. Hughes's (1) Motion For Summary Judgment And (2) Motion To Strike Plaintiffs' Liability Experts.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested.

LOWENSTEIN SANDLER PC
*Attorneys for Defendants Genesis
Genetics Institute, LLC and
Mark R. Hughes*
By: s/ Thomas E. Redburn, Jr.
Thomas E. Redburn, Jr.
Sarah Blaine

- and -

Stephen N. Leuchtman, Esq.
Of Counsel to Trowbridge Law Firm,
P.C.
(admitted pro hac vice)

Dated: January 20, 2010